

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

ANITA LANN, et al.,

Plaintiffs,

v.

**TRINITY HEALTH
CORPORATION, et al.,**

Defendants.

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Case No. 14-CV-2237 (PJM)

**PLAINTIFFS' MOTION FOR AWARD
OF ATTORNEYS' FEES AND REIMBURSEMENT OF
EXPENSES AND FOR INCENTIVE AWARDS TO NAMED PLAINTIFFS**

Plaintiffs Anita Lann, Jean Atcherson, Albert R. Chavies, and Thomas Holland ("Named Plaintiffs"), and Plaintiff Mary Beth Henrick¹, respectfully move the Court for an Order: (i) approving awards of attorneys' fees and expenses to their attorneys Cohen Milstein Sellers & Toll, PLLC and Keller Rohrbach L.L.P. ("Class Counsel"), and (ii) granting Incentive Awards to themselves as class representatives.

Accordingly, for the reasons fully set forth in the accompanying Memorandum, Plaintiffs respectfully ask that the Court GRANT Plaintiffs' Motion and award \$7,885,025 million in attorneys' fees and expenses to Class Counsel, and include in that amount Incentive Awards of \$10,000 to each of the Named Plaintiffs and Plaintiff Mary Beth Henrick.

¹ Class Counsel seek incentive awards for all Named Plaintiffs, which is defined in the Settlement Agreement to include Mary Beth Henrick, who was expected to be added as a Named Plaintiff in the CHE case via amendment had the litigation progressed.

Dated: April 17, 2017

Respectfully submitted,
COHEN MILSTEIN SELLERS & TOLL PLLC

/s/ Michelle C. Yau

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on April 17, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/ Michelle C. Yau

Michelle C. Yau